REMARKS

Claims 16-22 and 81-106 are pending. The following amendments were made to claims 16, 81 and 88:

1. The claims now explicitly recite an implicit limitation of the claims, namely, that when the integration of the map data, the flow data and the traffic event information occurs to produce a virtual traffic network representing traffic conditions on the road system, the traffic event information is integrated by using the specific links on the road system that the traffic events are correlated to.

2. The phrase, "one or more links" was rephrased for clarity purposes only to refer to "specific links."

3. The claims now recite that the information about traffic events are "obtained from different sources than sources of the flow data."

4. A redundant phrase, "related to the traffic flow" was deleted.

Claims 98, 102 and 106 were amended to more explicitly recite implicit limitations of the claims, namely that the graphical display shows the flow data and the traffic event information on a map representing the virtual traffic network, and that the traffic event information is integrated into the map by using the specific links on the road system that the traffic events are correlated to.

No new matter was added. Each of the added and revised phrases are fully supported by the original specification.

Request for Interview Prior to Formal Action on Amendment

Applicants request an interview prior to formal action on this response. An "Applicant Initiated Interview Request Form" accompanies this response. Please contact Applicants' undersigned representative to schedule the interview.

Drawings

The Examiner objected to the drawings submitted on August 16, 2007 as being fuzzy.

Applicants compared the original PDF of the application drawings that were uploaded to USPTO with the drawings that appear on the USPTO's PAIR Image File Wrapper (IFW) and observed that the IFW drawings are significantly degraded in quality compared to the original PDF drawings. The original PDF drawings are legible, whereas many of the IFW drawings are not legible. The quality degradation may have been a result of the uploading and/or transmission process. While Applicants are mindful that requirements for corrected drawings will not be held in abeyance, to avoid the large expense of preparing a new set of drawings, Applicants respectfully request that the Examiner attempt to directly load the original PDF of the application drawings into the USPTO's IFW to determine if a set of drawings of sufficient quality can be obtained. To facilitate this request, a CD-ROM containing the original PDF of the application drawings that were uploaded to USPTO has been filed by mail in the USPTO concurrently with this response. See the accompanying "Transmittal of Formal Drawings Prior to Notice of Allowance." A courtesy copy of this Transmittal was electronically filed with the RCE paperwork.

Furthermore, the current drawing objection is unclear because it states that the drawings are "all not acceptable," but then lists only certain drawings as being fuzzy. Although Applicants are uncertain as to which drawings were deemed not acceptable, the resubmission of all of the drawings via the CD-ROM for uploading by the USPTO is believed to address the drawing objection.

Comments regarding Examiner's "Response to Arguments"

In the paragraph numbered 3 of the Office Action, the Examiner disagreed with Applicant's statement in the previous response that there was an agreement at the June 27, 2007 interview that the claims were patentable over Myr. Applicants regret any misunderstanding that may have occurred at the interview.

Prior Art Rejection

Claims 16-22 and 81-94 were rejected under 35 U.S.C. § 102(b) as being anticipated by Myr. This rejection is respectfully traversed for at least the reasons set forth below.

1. Myr

Myr was described in Applicant's previous response. However, upon further review of Myr, it was discovered that the description of "zones" provided in the previous response was not fully accurate because the zones were referred to as the individual squares 1-12 in Fig. 11, instead of a group of squares as described in paragraph [0124] of Myr. A new description of the zones in Myr is thus provided below that supersedes the previous description. Notwithstanding this clarification of Myr, Applicants' currently presented arguments for patentability of the independent claims are similar to the arguments presented in the previous response, as discussed in section 2 below and patentability of the claimed method, article of manufacture and apparatus is not affected by this clarification.

Myr discloses a vehicle guidance system that uses a plurality of vehicles equipped with mobile guidance units (MGUs) 10, a central traffic unit server (CTU) 5, and a communication system (COS) provided by the telecommunication service provider. The CTU 5 uses GSM/GPS technology or other wireless technology to track the positions of MGUs 10 and provides real time updates to a database of travel times for all roads. In response to a request from a driver for a route update from his present position to a desired destination, the system calculates the desired fastest route by utilizing both the regular travel times along segments of roads and predicted current travel times found by using information collected from tracking routines. Thereafter, the route is communicated to the driver.

Referring to Figs. 11 and 13 of Myr, information zones are established, and a CTU database accepts human operator information inputs regarding the zones (block 277 in Fig. 13). Fig. 11 shows squares 1-12 that are used to define zones as discussed in paragraph [0124] of Myr, which reads as follows (underlining added for emphasis):

> [0124] A large geographic area may be subdivided into a set number of subregions, a simple division consisting of squares in a regular grid. The size and division of the grid is predetermined by a number of criteria such as road density and average volume of traffic. A zone may be defined as a group of squares put together for a particular task. In particular, a zone of nine contiguous squares is called a neighborhood of its central square. For example, in FIG. 11, the zone (1,2,3,5,6,7,9,10,11) is identified as the neighborhood of the square 6. When a vehicle enters a square, say, square 6, its IMU database receives the updated information required for optimal navigation in that particular square and in its neighborhood (1,2,3,5,6,7,9,10,11). This information is specific traffic load data pertaining to that neighborhood. It is grouped accordingly to all vehicles situated inside of that square at preset time intervals, say, each 15 minutes. If the updated data is different from the previously stored data, then the CTU database will automatically replace the old data and recalculate an alternate route. If so desired, the driver will be given an option to continue on the previous route (see display in FIG. 8, Unit 6). As a vehicle moves from square 6 to square 7, in FIG. 11, it receives the updated partial route related to square 7 and reflecting the traffic load within its new neighborhood (2,3,4,6,7,8,10,11,12). Thus, updating of the relevant traffic jam information is done only on the local zone basis.

The "zones" in Myr have no specific relationship to road "sections" defined in Figs. 17 and 20-23 of Myr (see the sections, labeled "r#), because the squares that make up the zones are defined by criteria such as road density and average volume of traffic, whereas the sections in Myr are defined by stretches of road between intersections. Thus, a section may include only a portion of a zone, or may traverse multiple zones. Likewise, a zone may include only a portion of a section or may traverse multiple sections. **Stated simply, Myr has no discussion of how or if sections and zones are correlated.** Furthermore, Myr effectively discloses nothing more than a **black box** input in block 277 for traffic event information.

Fig. 13 shows inputs 8-12 regarding theoretical travel times, statistical travel times, current travel times, accident reports and weather reports for zones 1 through N. Zone data updates may then be sent to the MGUs (steps 283, 284 of Fig. 13), such as shown in Fig. 8. In Fig. 13 of Myr, the accident reports 11 and weather reports 12 are presumably entered by the Administrator (Human Operator) in block 277 and then correlated with a specific zone. Nowhere does Myr disclose or suggest any apparatus or methodology for correlating traffic events (e.g., accident reports and weather reports) that are entered in the Fig. 13 CTU database via the

Administrator (Human Operator) in block 277 with the road sections of Figs. 17 and 20-23. In fact, paragraph [0178] of Myr, which reads as follows, reinforces the fact that Myr describes correlating traffic events only with zones, and not road sections (underlining added for emphasis):

> [0178] In this refinement, the CTU database administrator can utilize most recent information on various traffic accidents and road disturbances reported by reliable sources. These are generally reported as static news items and presented in various formats. The administrator can enter these data directly into the CTU database together with the geographical location, time of the event, expected duration, etc. Similarly, the administrator can record all weather reports and road conditions as related to specific regions. These data can then be entered into the CTU database as related to specific zones together with other traffic data as a part of regional or zone traffic report.

To summarize, the accident reports 11 and weather reports 12 that are entered in the Fig. 13 CTU database via the Administrator (Human Operator) in block 277 of Myr are correlated with a zone, as clearly shown in Fig. 13. The accident reports 11 and weather reports 12 that are entered in the Fig. 13 CTU database via the Administrator (Human Operator) in block 277 of Myr are not correlated to specific road sections because Myr has no discussion of how or if sections and zones are correlated.

Furthermore, nothing in Fig. 8 contradicts this understanding of Myr. Fig. 8 merely shows that the MGU is capable of retrieving whatever Accident Reports 11 and Weather Reports 12 are stored in the CTU Database of Fig. 13, as described in paragraph [0112] of Myr, which reads, in part, as follows (underlining added for emphasis):

> [0112] In the preferred embodiment the MGU's mobile PC Display Panel 181 is color CRT or a touch screen color display device easily accessible to the driver...In addition, the driver may receive both audio and visual summary of all traffic situations and slowdowns 189-101 in the particular zone he is traveling in, all in real time.

Again, since Myr has no discussion of how or if sections and zones that are entered in the Fig. 13 CTU database via the Administrator (Human Operator) in block 277 of Myr are correlated, the

delivery of traffic information by zone does not provide a disclosure of traffic events correlated to Myr's sections of a road system.

Figs. 20-24 of Myr disclose route planning algorithms as described in paragraphs [0161] through [0173] of Myr. For example, Fig. 20 shows how to perform a search for an optimal (shortest) route on a graph of roads. The roads in Figs. 20-23 are identified by sections, labeled "r#." However, nowhere does Myr disclose any apparatus for correlating the traffic events (e.g., accident reports and weather reports) that are entered in the Fig. 13 CTU database by the Administrator (block 277) with the road sections of Figs. 20-23.

2. Patentability of claims 16, 81 and 88 over Myr

Amended claim 16 reads as follows (underlining added for emphasis)

> 16. A computer-implemented method of creating a virtual traffic network representing traffic conditions on a road system, the method comprising:
> (a) inputting into a processor map data representing a road system, the road system being defined by a plurality of links;
> (b) inputting into the processor flow data related to traffic flow on the road system;
> (c) inputting into the processor information about traffic events obtained from different sources than sources of the flow data, including information that correlates the traffic events to specific links on the road system, wherein the traffic events are occurrences on the road system which may have an impact on the flow of traffic, and the traffic event information is inputted into the processor separately from the flow data; and
> (d) the processor integrating the map data, the flow data and the traffic event information to produce a virtual traffic network representing traffic conditions on the road system, wherein the virtual traffic network indicates both the flow data and the traffic event information, the traffic event information being integrated by using the specific links on the road system that the traffic events are correlated to.

Figs. 21 and 22 show preferred examples of entering traffic events (here, accident and congestion incidents) and correlating the traffic events with links on a road system. Links are described, in part, on paragraph [00167] on page 27, lines 6-15 of the present specification, which reads as follows (underlining added for emphasis):

> [00167] Fig. 15 represents an example of the base layer 312 showing the lowest level of link definitions. A roadway 320 (in this case I-91) is defined as a set of links and nodes. Each link represents a distinct stretch of the roadway 320 between two nodes. A node is where a commuter either needs to make a decision along the roadway 320 or where two or more roadways merge together. In the example of Fig. 15, the link 1201 ends at node 322 where the on-ramp link 321 from roadway 330 (route 121) joins roadway 320. The links 1201 and 321 are connected through node 322 to downstream link 1202. Link 1202 ends at node 324, where there is an off-ramp link 323 from roadway 320 to roadway 340 (I-90) and a through link 1203. Each roadway throughout the base layer 312 comprises links and nodes similar to this scenario, including the links and nodes representing traffic in the opposite direction on a split highway or intersections on tertiary roadways.

As discussed above, the CPU database in Myr that receives traffic events (e.g., accident reports and weather reports) that are entered in the Fig. 13 CTU database via the Administrator (Human Operator) in block 277 for the zones has no description that the traffic events are correlated with sections on a road system. Thus, even if Myr's sections are equivalent to the claimed links, Myr does not disclose any of the above-highlighted limitations of claim 16. Nor do any other portions of Myr disclose such limitations.

On page 3 of the outstanding Office Action, the Examiner highlights paragraph [0136] of Myr as disclosing traffic events such as accidents and weather which are correlated to links on a road system. This portion of Myr describes the CTU database of Fig. 13, and for the reasons discussed above, does not disclose traffic events correlated with links on a road system.

The Examiner further highlights probe vehicle information in paragraph [0100] of Myr as being relevant to this limitation. This paragraph of Myr does not refer to "probe vehicles." However, it is presumed that the Examiner is referring to the probe vehicles that contain MGUs, wherein the travel times of the probe vehicles (as determined from movement of their mobile cell phone units) provide traffic congestion information, apparently referred to in Myr as "bottlenecks," to the CTU database. Paragraphs [0101] and [0148] of Myr describe how congestion/bottleneck information is used (underlining added for emphasis):

> [0101] FIG. 1 is a schematic representation of the information exchange between CTU, MGUs and the GSM Network Server in the Guidance

> System as described in detail in the Brief Description in the Overview of the Guidance System. The CTU is configured to utilize GSM/GPS or other wireless technology for receiving location data from a fleet of moving vehicles equipped with MGUs that are traveling and thereby passively collecting sample traffic congestion data along a broad range of road systems. Location data are temporarily stored on GSM Network Server in Multiple-GPS Locator Packet (MGLP). The CTU Server accesses the MGLP data on Network Server via Automatic Packet Interrogation process and stores the relevant information. The CTU processes these location data, converts them into travel time data, and stores them in the database to be later used as regular travel time data and current travel time data. Those data will be used for calculating fastest routes for the clients.
>
> [0148] FIG. 12 describes calculations of travel times in category A roads. Block 251: Get a section S (in category A) to be processed. Block 252: Read the EXL associated with section S. Block 253: The goal here is to detect bottleneck situations, and to modify estimated Current Travel Time (CTT) accordingly. The criterion for using CTT rather than Regular Travel Times (RTT) for various sections is that EXL contains recent enough data. If 1) latest n vehicles on EXL have left section S within predetermined Time Interval (TI) (short enough to consider the detected bottleneck to be current), and 2) each of them has spent considerably more time on S than the corresponding RTT, then the situation can be interpreted as a bottleneck on the section S. Let t denote the time the vehicle under discussion is expected to commence traveling on S, TE(i) and TEX(i) the entry and exit times respectively for each vehicle V(i), i=1, 2, . . . , N, on the EXL, and the value e denotes a significant change between RTT and the observed travel time (say, e=10% of RTT).

According to the above description, the current travel time is modified when Myr's probe detects congestion, as indicated by a bottleneck. Assuming, *arguendo*, that the current travel time in Myr corresponds to Applicants' claimed "flow data related to traffic flow on a road system," then Myr does not disclose or suggest that anything else is done with the congestion/bottleneck information, other than to modify the current travel time. That is, the congestion data obtained from probes in Myr is used only to calculate flow data. In contrast to Myr, the virtual traffic network in amended claim 16 reflects both the flow data and the traffic event information. Thus, if a congestion incident exists in the method of claim 16, the congestion incident will be indicated in the virtual traffic network, whether or not it is used as part of the flow data. In sum, Myr's congestion disclosure does not meet the claim limitations.

The remaining portions of Myr highlighted by the Examiner were carefully reviewed, including paragraphs [0013]-[0021], [0063-0069], and Figs. 20-23, but none of these portions make up for the above-noted deficiencies in Myr.

Accordingly, it is respectfully requested that the § 102(b) rejection over Myr be withdrawn.

Amended claims 81 and 88 are similar in scope to claim 16 and are thus also believed to be patentable over Myr for the same reasons as applied to claim 16.

3. Response to Examiner's "Response to Arguments"

In the paragraph numbered 3 of the Office Action, the Examiner responded to certain arguments made by Applicants in the previous response. Applicants provide the following response to the Examiner's latest arguments:

i. In the paragraph spanning pages 6-7 of the outstanding Office Action, the Examiner states that Myr anticipates Applicants' definition of "links." In response, Applicants are not arguing that Myr fails to disclose "links." Instead, Applicants' argument is that even assuming that the road sections of Figs. 17 and 20-23 are equivalent to the claimed links, the traffic events in Myr (e.g., accident reports and weather reports) that are entered in the Fig. 13 CTU database via the Administrator (Human Operator) in block 277 of Myr are not correlated with links, as required by the claim limitations. As discussed above, Myr describes correlating traffic events entered via the Administrator (Human Operator) in block 277 only with zones, and not with road sections.

Myr discloses a CTU database that accepts human operator information inputs regarding the zones (block 277 in Fig. 13). However, no details are provided regarding the structure of the inputs. In contrast to Myr, the claimed method, article of manufacture and apparatus requires that the traffic event information be correlated to specific links on the road system. Myr's block 277 is nothing more than a **black box** input for traffic event information, and thus cannot anticipate the claimed method, article of manufacture and apparatus.

ii. On page 7 of the outstanding Office Action, the Examiner disagreed with Applicants' argument that Fig. 11 of Myr discloses zones and not road links. The Examiner provided the following additional explanation to refute this argument (underlining added for emphasis):

> The zones in fig. 11 are defined by roads (Myr, sec. 0124, 0126, 0135). As can also be seen in figs. 11 and 13, the zones are made up of roads. Therefore, accidents, weather and traffic flow data, etc corresponding to a zone also correspond particularly to the road link in that zone.

Applicants respectfully disagree with the above-highlighted statements. Paragraph [0124] of Myr provides a detailed discussion of how zones are defined, and nowhere in this paragraph is there any disclosure that the zones are defined by roads. Paragraph [0124] of Myr was discussed above. The relevant portions of this paragraph regarding how zones are defined are repeated below for convenience.

> [0124] A large geographic area may be subdivided into a set number of subregions, a simple division consisting of squares in a regular grid. The size and division of the grid is predetermined by a number of criteria such as road density and average volume of traffic. A zone may be defined as a group of squares put together for a particular task. In particular, a zone of nine contiguous squares is called a neighborhood of its central square. For example, in FIG. 11, the zone (1,2,3,5,6,7,9,10,11) is identified as the neighborhood of the square 6...

Furthermore, while Myr discloses that accidents and weather correspond to a zone, there is no disclosure in Myr that accidents and weather also correspond to a road link (section) in that zone because, as repeatedly emphasized above, **Myr has no discussion of how or if sections and zones are correlated**. Applicants are not arguing that traffic flow data is not correlated to a road link (section), so the Examiner's argument regarding traffic flow data is not relevant to Applicants' argument.

Applicants agree that zones include roads, and thus inherently include the road sections defined in Figs. 17 and 20-23. However, Applicants' claims do not broadly recite that traffic events are correlated to roads on a road system, but rather to specific links on the road system. By providing a road system that is defined by a plurality of links (claim 16, clause (a)), inputting flow data related to traffic flow on the road system (claim 16, clause (b)), and correlating traffic events to specific links on the road system (claim 16, clause (c)), a virtual traffic network can be efficiently produced (claim 16, clause (d)). No such capability is provided for in Myr.

iii. The Examiner states that Applicants' arguments are focused mainly on Fig. 13, but fails to consider Figs. 17 and 20-24. Applicants respectfully disagree. The previous response and the current response both fully discuss these figures and how they relate, and how they do not relate, to Fig. 13. The Examiner appears to be reading features into Fig. 13 that are simply not described. Most importantly, the Examiner incorrectly assumes that because Figs. 17 and 20-24 disclose road sections, the road sections are used in Fig. 13 to store accident and weather data entered by the Administrator (Human Operator) in block 277. Nowhere does Myr disclose or suggest any such feature.

iv. On page 7 of the outstanding Office Action, the Examiner states that Applicants' previous argument that "Myr identifies the road within the zone that correlates to the traffic event (e.g., accident report)" and that "the specific road sections where these accidents occurred" are admissions that Myr discloses the claimed invention. Applicants respectfully disagree.

Applicants' first statement was taken out of context by the Examiner and was not an admission of lack of novelty. The full statement read as follows:

> Furthermore, even if the human operator in Myr identifies the road within the zone that correlates to the traffic event (e.g., accident report) for purposes of generating the travel information (e.g., accident information 189) of Fig. 8, there is still no correlation of the traffic event to links on a road system, as recited in the claimed method, article of manufacture and apparatus.

In fact, this paragraph presents the same argument for patentability that has been made throughout prosecution of this application.

Applicants' second statement was a quotation from paragraph [0179] of Myr. This paragraph describes a proposed scheme that uses traffic flow data to infer that an accident has occurred. That is, the traffic flow data would be used for two purposes, namely, to provide the actual traffic flow and to infer the presence of a traffic incident. Applicants' claims explicitly distinguish over Myr by reciting that information about traffic events are "obtained from different sources than sources of the flow data" and that "the traffic event information is inputted into the processor separately from the flow data." While Myr discloses such a separate inputting process in block 277 of Fig. 13 wherein the CTU Database accepts human operator information inputs

regarding the zones, this separate inputting **black box** process does not meet the claim limitations of correlating traffic events to specific links on the road system, as fully discussed above.

v. In the first full paragraph on page 7 of the outstanding Office Action, the Examiner responded to selected statements made by Applicants by asserting that no claim limitations were presented that related to such statements. In response, these statements were merely explanatory statements and were not presented for purposes of highlighting claim limitations. Applicants' previous and current response explicitly highlighted the claim limitations that are not believed to be disclosed in Myr. See section 2 of the previous and current responses.

vi. In the second full paragraph on page 7 of the outstanding Office Action, the Examiner asserts that Applicants have ignored various text portions and figures of Myr that allegedly anticipate the pending claims. In response, Applicants have focused the reasons for patentability on only selected limitations of the claims and have responded to all portions of Myr highlighted by the Examiner as being relevant to those limitations.

4. Patentability of dependent claims 19, 84 and 91

Claim 19 reads as follows:

> 19. The method of claim 16 wherein step (a) further comprises customizing the map data to define locally known features of the road system.

Preferred embodiments of the claimed customization process are described, in part, on paragraphs [0166] and [0169] of the specification. See the discussion of "custom points" and an example of designating the Conshohocken curve as one such point. No such limitation is disclosed or suggested in Myr.

The outstanding rejection refers to various figures and text portions of Myr as allegedly disclosing this limitation. Applicants have carefully reviewed all such figures and text portions and cannot locate any disclosure in Myr that is even remotely related to this limitation. If the Examiner repeats this rejection, it is respectfully requested that a more specific portion of Myr be highlighted so that Applicants can appropriately respond to the rejection.

Claims 84 and 91 are similar in scope to claim 19 and are thus also believed to be patentable over Myr for the same reasons as applied to claim 19.

5. Patentability of dependent claims 98, 102 and 106

Claim 98 reads as follows:

> 98. The method of claim 16 further comprising:
> (e) graphically displaying the virtual traffic network, including the map data, the flow data and the traffic event information, the graphical display showing the flow data and the traffic event information on a map representing the virtual traffic network, the traffic event information being integrated into the map by using the specific links on the road system that the traffic events are correlated to.

One preferred embodiment of the claimed graphical displaying is shown in Fig. 6 of the specification. See, for example, the traffic event information (e.g., Alert Types - Incidents, Advisories, Events and Alerts) that is integrated into the map that represents the virtual traffic network. Applicants' link-based recording of traffic event information, which can then be coordinated with the links of the road system, provide for this functionality. No such claim limitation is disclosed or suggested in Myr.

In the outstanding Office Action, the Examiner refers to Figs. 8 and 13 and paragraphs [0112] and [0136] of Myr as allegedly disclosing this limitation. Applicants respectfully traverse this grounds of rejection.

Fig. 8 shows the MGU that was discussed above. While the MGU is a map of roads, no traffic event information is integrated into the map, or even shown on the map at all. If the user selects one of the traffic information buttons 189-191, the user receives only text displays. See paragraph [0111] of Myr, which reads, in part, as follows (underlining added for emphasis):

> [0111] The vehicle's display is an MGU mobile PC display panel. FIG. 8 is a view of the layout of a CMU display panel 180... Text displays include Route Preference information...Further text information under the category Traffic Information includes Accident Information 189, Accident Query 190 and Road Closures 191.

Paragraph [0112] of Myr states that "...the driver may receive both audio and visual summary of all traffic situations and slowdowns 189-101[1] in the particular zone he is traveling in, all in real time." However, there is no disclosure in Myr that the visual summary is integrated into the map shown on the MGU. In fact, the visual summary appears to be similar to the text information referred to in paragraph [0111].

Fig. 13 of Myr does not make up for the deficiency in Fig. 8 of Myr because Fig. 13 merely shows how data is prepared to be sent to the MGU of Fig. 8. Paragraphs [0112] and [0136] of Myr also do not make up for the deficiencies in Figs. 8 and 13. The relevant text portion of paragraph [0112] was discussed immediately above. Paragraph [0136] merely describes the functionality of the CTU Database of Fig. 13, and thus provides no disclosure that traffic event information is integrated into the map shown on the MGU, or into any other type of map.

Claims 102 and 106 are similar in scope to claim 98 and are thus also believed to be patentable over Myr for the same reasons as applied to claim 98.

6. Patentability of remaining dependent claims

The remaining dependent claims are believed to be patentable over the applied references for at least the reason that they are dependent upon allowable base claims and because they recite additional patentable elements and steps.

Conclusion

Insofar as the Examiner's rejections were fully addressed, the instant application is in condition for allowance. Issuance of a Notice of Allowability of all pending claims is therefore earnestly solicited.

[1] It appears that "101" should have read "191."

Respectively submitted,

Brian Smyth *et al.*

February 19, 2008 By: Clark Jablon
(Date)

CLARK A. JABLON
Registration No. 35,039
PANITCH SCHWARZE BELISARIO & NADEL LLP
One Commerce Square
2005 Market Street, Suite 2200
Philadelphia, PA 19103-7013
Telephone: 215-965-1330
Direct Dial: 215-965-1293
Facsimile: 215-965-1331